

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
213 623 9300

JOEL D. SIEGEL (SBN 155581)
joel.siegel@dentons.com
PAUL M. KAKUSKE (SBN 190911)
paul.kakuske@dentons.com
JUDITH SHOPHET SIDKOFF (SBN 267048)
judith.sidkoff@dentons.com
KELLY R. GRAF (SBN 301325)
kelly.graf@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, CA 90017-5704
Telephone: 213 623 9300
Facsimile: 213 623 9924

LAURA LEIGH GEIST (SBN 180826)
laura.geist@dentons.com
DENTONS US LLP
1999 Harrison Street, Suite 1300
Oakland, CA 94612-4709
Telephone: 415.882.5000
Facsimile: 415.882.0300

Attorneys for Defendant
PAYPAL, INC.,

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBKOV, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

PAYPAL, INC., a Delaware corporation; and
DOES 1-25, inclusive,

Defendants.

No. 5:22-cv-00248

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT
(L.R. 6-1(a))**

Current Response Date: 02/14/2022

New Response Date: 03/16/2022

Date Action Filed: January 13, 2022

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6-1(a) of the Northern District of California Civil Local Rules, Plaintiffs Lena Evans, Roni Shemtov, and Shabdan Akylbekov (“Plaintiffs”) and Defendant PayPal, Inc. (“Defendant”), by and through their respective counsel, hereby stipulate as follows:

//

STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT

5:22-CV-00248

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
213 623 9300

WHEREAS, Plaintiffs filed a complaint in the above-entitled action in the United States District Court, Northern District of California on January 13, 2022;

WHEREAS, Defendant was served with a copy of the Summons and Complaint on January 24, 2022;

WHEREAS, Defendant's current deadline to respond to Plaintiffs' Complaint is February 14, 2022; and

WHEREAS, under Civil Local Rule 6-1(a), parties may stipulate in writing, without a court order, to extend the time within which to answer or otherwise respond to a complaint;

WHEREAS, the Parties have conferred and agree that a 30-day extension of time for Defendant to respond to the Complaint is appropriate under the circumstances, as Defendant recently retained counsel in this matter and requires additional time to review the allegations in the Complaint and respond thereto;

WHEREAS, good cause exists for this extension because it will not prejudice any party nor substantially alter the Court's calendar;

NOW THEREFORE, pursuant to Civil Local Rule 6-1(a), the parties hereby stipulate and agree that Defendant's deadline to respond to the Complaint is extended to and including March 16, 2022.

IT IS SO STIPULATED.

Dated: February 4, 2022

Respectfully submitted,

DENTONS US LLP

By: /s/Joel D. Siegel
Joel D. Siegel

Attorneys for Defendant
PAYPAL, INC.,

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
213 623 9300

1 Dated: February 4, 2022

THE BENSAMOCHAN LAW FIRM, INC.
SCHREIBER AND SCHREIBER, INC.
ERIC BENSAMOCHAN

4 By: /s/Eric Bensamochan

Ean Matthew Schreiber
Eric Andrew Schreiber
Eric Bensamochan

6 Attorneys for Plaintiffs
7 LENA EVANS, RONI SHEMTOV, AND
8 SHBADAN AKYLBKOV

11 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

12 In accordance with Civil Local Rule 5-1, I attest that concurrence in the filing of this
13 document has been obtained from the other signatories, which shall serve in lieu of their
14 signatures on the document.

16 Dated: February 4, 2022

DENTONS US LLP

18 By: /s/Joel D. Siegel

Joel D. Siegel

19 Attorneys for Defendant
20 PAYPAL, INC.,